

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

KAREN M. DONNELLY, individually,
and on behalf of all others similarly situated

Plaintiff,

v.

**APPLIED BUSINESS SERVICES, INC.,
D/B/A SECURITY COLLECTION
AGENCY**, both as a company as well as its
various owners

Defendant.

Case No. 4:16-cv-00502-RWS

Judge Rodney W. Sippel

JOINT PROPOSED SCHEDULING PLAN

COME NOW all counsel of record and pursuant to Rule 16 and this Court's April 14, 2016 order, hereby submit the following joint proposed scheduling plan:

1. Track Assignment: The parties believe that Track 3 assignment is appropriate given that this is a putative class action case;

2. Joinder of Additional Parties/Amendment of Pleadings: All motions for leave to join additional parties and for leave to amend pleadings shall be made on or before **August 12, 2016**.

Discovery Plan:

(a) Electronically Stored Information: Counsel do not anticipate any issues concerning electronically-stored discovery. The parties agree to produce the requested records in PDF or Excel format.

(b) Claims of Privilege and/or Work Product Protection: All issues concerning privilege or work-product will be raised in objections to discovery with a corresponding privilege

log. The parties will make all reasonable efforts to resolve such disputes.

(c) All parties shall disclose information and exchange documents pursuant to Rule 26(a)(1) on or before **May 31, 2016**.

(d) **Discovery Limitations**: The discovery will not be conducted in phases nor limited to certain issues.

(e) **Expert Witness Disclosure**: Plaintiff will disclose its experts on or before **October 14, 2016** and make them available for deposition by **November 14, 2016**. Defendant will disclose its experts by **November 21, 2016** and make them available for deposition by **December 23, 2016**.

(f) **Deposition and Interrogatory Limits**: No variance from the presumptive limits for depositions and interrogatories is anticipated.

(g) **Physical and Mental Examinations of Parties**: At this time the parties do not anticipate seeking physical or mental examinations of any parties.

(h) **Close of Discovery**: All written discovery shall be completed by **October 14, 2016**. All discovery in this case shall be completed no later than **January 16, 2017**.

(i) No other matters are pertinent to discovery in this case.

3. **Alternative Dispute Resolution**: The parties believe the case may be appropriate for mediation. Mediation will be completed on or before **October 28, 2016**.

4. **Motions to Dismiss and Judgment on the Pleadings**: Any motions to dismiss or judgment on the pleadings shall be filed on or before **August 29, 2016**.

5. **Motions to Exclude or Limit Expert Testimony**: Any motions to limit or exclude expert testimony must be filed on or before **February 3, 2017**. Opposition briefs must be filed on

or before **February 17, 2017**. Reply briefs must be filed on or before **February 24, 2017**.

6. Class Certification. Plaintiff will file her motion for class certification with all supporting evidence on or before **February 3, 2017**. Defendant will file its any response in opposition to Plaintiff's motion and memorandum on or before **March 3, 2017**. Plaintiff may file a reply in support of class certification on or before **March 20, 2017**.

7. Summary Judgment. Any motions for summary judgment must be filed within thirty days of this Court's ruling on any motion for class certification. Opposition briefs must be filed no later than thirty days after the motion, and any reply brief may be filed no later than ten days following the response brief.

8. Trial: The parties request that a trial date be set after the Court's ruling on class certification.

At this time, the parties do not anticipate any other matters that need to be included in the Joint Scheduling Plan.

Dated: May 13, 2016

Respectfully submitted,

KAREN DONNELLY

SECURITY COLLECTION AGENCY

By: /s/ Thomas R. Applewhite

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Counsel for Plaintiff

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2016, the foregoing was filed utilizing this Court's ECF system, which will distribute an electronic version of the foregoing to all counsel and parties of record.

/s/ Thomas R. Applewhite